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March 8, 2019

**By ECF**

Hon. Katherine H. Parker  
United States Magistrate Judge – S.D.N.Y.  
United States Courthouse  
500 Pearl Street, Courtroom 17D  
New York, NY 10007

Re: Michael Kors v. Su Yan Ye, et al. - 18 Civ. 02684 (KHP)

Dear Hon Judge Parker:

Pursuant to the Court's Order during the parties' February 26, 2019 telephone conference, we write on behalf of both parties to advise the Court of the parties' remaining discovery disputes, a briefing schedule therefor, and the parties' proposals for the completion of discovery.

**Discovery Dispute**

The parties have met and conferred via email and telephone and remain in dispute in over Plaintiff's objections and responses, in whole or part, to the following discovery propounded by Defendant:

- Requests for Admission: 1, 2, 13, 14
- Document Requests: 6, 12, 13, 16, 20, 21, 22, 28, 31, 32, 33, 34, 37

The parties propose that Defendant file a letter brief regarding its position in this discovery dispute no later than **March 25, 2019**. Plaintiff shall file its responsive letter brief no later than **March 29, 2019**. Each letter brief shall be no longer than 3 pages.

**Completion of Discovery**

The parties have met and conferred but were unable to agree on all proposed deadlines for the completion of discovery, which currently is set to close April 12, 2019.

**Cowan, Liebowitz & Latman, P.C.**

Hon. Katherine H. Parker

March 8, 2019

Page 2

The parties have agreed to the following deadlines:

- Plaintiff shall amend certain discovery responses and produce certain documents (as set forth in Plaintiff's March 6, 2019 letter to Defendant) no later than **March 22, 2019**.
- The deadline for all fact discovery (other than Defendant's deposition of Plaintiff's corporate witness) shall remain as **April 12, 2019**.

The parties have not been able to agree on the deadline for Defendant to complete the deposition of Plaintiff's corporate witness.

- Plaintiff requests such deadline occur by the current close of discovery, **April 12, 2019**.
- Because Defendant asserts that it cannot reasonably depose Plaintiff's corporate representative until Plaintiff completes its document production and amends its discovery responses, including as potentially ordered by the Court, Defendant requests that the deadline for Defendant to complete the deposition of Plaintiff's corporate representative shall be no later than **four weeks** after any deadlines for amendment and production of Plaintiff's responses set forth by the Court in its Order determining the parties' discovery dispute noted above.

Respectfully submitted,

s/ Eric J. Shimanoff

*Attorney for Defendant*

s/ Jessica C. Covington

*Attorney for Plaintiff*